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August 14, 2019

Via EmailFrank Bibeau
51124 County Road 118
Deer River, MN 56636**RE: Campbell v. Honor the Earth
Case No. 03-CV-19-266**

Dear Mr. Bibeau:

I received your letter yesterday afternoon and am disappointed in your client's refusal to follow the discovery rules. I have called the district court clerk to obtain a hearing date on a motion to compel and anticipate receiving a date and filing a motion tomorrow.

I would urge your client to reconsider and simply provide discovery responses without further waste of resources. As you are aware, civil rights laws are fee-shifting if the plaintiff is ultimately successful. I have now spent significant time and effort in an attempt to obtain some very simple and straightforward discovery responses. In my most recent fee petition, approximately one year ago, I was approved for an hourly billing rate of \$350. My rate increases every year. I have spent over 100 hours so far on discovery issues, which is far more than is typical at this point. If my client is ultimately successful with her claims, and I believe she will be, those costs will be shifted to your client.

I have no desire to bankrupt an organization such as Honor the Earth that does such valuable work. Please ask your client to reconsider its approach here. I am attaching a draft copy of the memo I will finalize and file with my motion tomorrow. Please review it. I will file it tomorrow afternoon or after I receive a hearing date, whichever is later, unless I hear from you before that.

Sincerely,

/s/ Christy L. Hall

Christy L. Hall

cc: Margaret Campbell

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